

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

GOEBEL INSURANCE AGENCY, INC., a	)	
Pennsylvania corporation, individually and	)	
as the representative of a class of similarly-	)	
situated persons,	)	
	)	Civil Action No.: 2:16-04775
Plaintiff,	)	
	)	<b>CLASS ACTION</b>
v.	)	
	)	
PRECISE PAYROLL, LLC and JOHN	)	
DOES 1-5,	)	
	)	
Defendants.	)	

**JOINT STIPULATION OF DISMISSAL**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff, GOEBEL INSURANCE AGENCY, INC., and Defendant, PRECISE PAYROLL, LLC, through their undersigned attorneys, hereby dismisses this action with prejudice as to Defendant, PRECISE PAYROLL, LLC, individually, and without prejudice as to the members of the putative class, each side to bear its own costs.

s/ Brian J. Wanca  
Brian J. Wanca

Brian J. Wanca (*pro hac vice admitted*)  
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s/ Alan R. Zibelman (with permission)  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2017 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

s/ Brian J. Wanca